

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

STAGE STORES, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 20-32564 (CML)
)
) (Jointly Administered)
)

**STIPULATION AND AGREED REPORT AND RECOMMENDATION TO
WITHDRAW THE REFERENCE BETWEEN THE UNITED STATES TRUSTEE
AND JACKSON WALKER LLP
[RELATES TO ECF Nos. 1216 & 1217]**

WHEREAS on November 2, 2023 the United States Trustee (the “UST”) filed his *Motion for Relief from Judgment or Order Pursuant to Federal Rule of Civil Procedure 60(b)(6) and Federal Rule of Bankruptcy Procedure 9024 Approving Any Jackson Walker Applications for Compensation and Reimbursement of Expense* [ECF No. 1216] (the “**Rule 60 Motion**”);

WHEREAS on the same day the UST filed his *Motion for Withdrawal of the Reference and Referral of Motion for Relief under Rule 60(b)(6) and Related Matters* [ECF No. 1217] (the “**Motion to Withdraw**”) requesting that Rule 60 Motion be withdrawn pursuant to 28 U.S.C. § 157(d);

WHEREAS the UST and Jackson Walker LLP (“**Jackson Walker**”) (the UST and Jackson Walker, collectively, the “**Parties**”) consent to the withdrawal of the reference of the Rule 60 Motion, together with all matters related to the Rule 60 Motion, to the District Court for the Southern District of Texas;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Stage Stores, Inc. (6900) and Specialty Retailers, Inc. (1900). The Debtors’ service address is: 2425 West Loop South, Houston, Texas 77027.

WHEREAS the Parties request that the Court recommend withdrawal of the reference, and issue an order permitting continued discovery on the Rule 60(b) Motion but delay further briefing on the merits of the Rule 60(b) Motion until after the District Court rules on the Motion to Withdraw.

Accordingly, upon the request and agreement of the Parties, it is therefore **RECOMMENDED THAT:**

1. Pursuant to 28 U.S.C. § 157(d), the Court recommends that the Rule 60 Motion be withdrawn to the District Court for the Southern District of Texas.

It is ORDERED THAT:

2. The Parties may continue to engage in discovery with respect to the Rule 60(b) Motion.

3. Pursuant to Federal Rule of Bankruptcy Procedure 5011, further briefing on the merits of the Rule 60 Motion shall be stayed pending the District Court for the Southern District of Texas's adoption of this report and recommendation or other disposition of the Motion to Withdraw.

Signed on this ____ day of _____, 2023.

United States Bankruptcy Judge

NORTON ROSE FULBRIGHT US LLP

By: /s/ Jason L. Boland
Jason L. Boland (SBT 24040542)
William R. Greendyke (SBT 08390450)
1301 McKinney Street, Suite 5100
Houston, Texas 77010
Telephone: (713) 651-5151
jason.boland@nortonrosefulbright.com
william.greendyke@nortonrosefulbright.com

Counsel for Jackson Walker LLP

KEVIN M. EPSTEIN
UNITED STATES TRUSTEE
REGION 7, SOUTHERN AND WESTERN
DISTRICTS OF TEXAS

By: /s/ Millie Aponte Sall
Millie Aponte Sall
Assistant U.S. Trustee
Tex. Bar No. 01278050/Fed. ID No. 11271
515 Rusk, Suite 3516
Houston, Texas 77002
(713) 718-4650 – Telephone
(713) 718-4670 – Fax
Email: millie.sall@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive such service.

/s/ Jason L. Boland
Jason L. Boland